

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA

*v.*

KEVIN M. SULLIVAN

Criminal Action No.

1:15-CR-290-MHC-CMS

**Clarification to the Government's Sentencing Memorandum**

The United States of America, by John A. Horn, United States Attorney, and Paul R. Jones and Erin Sanders, Assistant United States Attorneys for the Northern District of Georgia, files this Clarification to the Government's Sentencing Memorandum.

In its Memorandum, the Government referred to the Defendant wiping his home computer after agents executed a search warrant at this office at Emory University. (Doc. 71-9-10.) After filing the Memorandum, the Government discussed this incident with the computer forensics analyst, who stated that the home computer showed that child pornography files were deleted, but the home computer was not entirely wiped clean. Following the deletion of these files, the computer was defragmented. The defragmentation meant that the forensics analyst could not recover the deleted files. However, the file names were not deleted during defragmentation. The vast majority of the files names matched the names of child pornography files found on the laptop and hard drive seized from the Defendant's office. On the home computer, the forensics analyst found

additional file names that were indicative of child pornography. In other words, the child pornography files were wiped, but not every file on the computer was. The home computer still contained numerous items, including non-contraband photos and videos.

Respectfully submitted,

JOHN A. HORN  
*United States Attorney*

/s/PAUL R. JONES  
*Assistant United States Attorney*  
Georgia Bar No. 402617  
Paul.Jones@usdoj.gov

/s/ERIN E. SANDERS  
*Assistant United States Attorney*  
Georgia Bar No. 552091  
Erin.Sanders@usdoj.com

600 U.S. Courthouse, 75 Ted Turner Drive S.W., Atlanta, GA 30303  
(404) 581-6000 fax (404) 581-6181

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Donald Samuel, Esq.

Kristen W. Novay, Esq.

Bruce S. Harvey, Esq.

February 28, 2017

/s/ PAUL R. JONES

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PAUL R. JONES

*Assistant United States Attorney*